



Magistrate Judge David W. Christel

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff

v.

RICHARD CHARLES SANCHEZ,

Defendant.

NO. *MJ17-5086*

COMPLAINT for VIOLATION

Title 18, United States Code, Section 1073

BEFORE, David W. Christel, United States Magistrate Judge, U.S. Courthouse,
Tacoma, Washington.

The undersigned complainant being duly sworn states:

COUNT ONE
(Flight to Avoid Prosecution)

On a date unknown, but since March 25, 2010, at Tacoma, within the Western District of Washington, RICHARD CHARLES SANCHEZ did knowingly move and travel in interstate and foreign commerce from Tacoma, Washington, to Mexico, with the intent to avoid prosecution for the crime of felony murder under the laws of the State of Washington.

All in violation of Title 18, United States Code, Section 1073.

1 The undersigned complainant being duly sworn further states:

2 1. I, Terrance G. Postma, am a Special Agent of the Federal Bureau of
3 Investigation (FBI) assigned to the Seattle Division's Tacoma Resident Agency. I have
4 been employed as a Special Agent of the FBI for approximately fifteen years and am
5 currently assigned to the Seattle Division's Tacoma Resident Agency. I am currently
6 assigned to investigate violent crimes and violent criminal acts. Part of my assigned case
7 load involves the investigation of cases involving flight to avoid prosecution.

8 2. The statements contained in this affidavit are based upon my investigation
9 and information provided to me by other law enforcement officers. I have not included
10 each and every fact known to me or other investigative personnel concerning this
11 investigation. I have set forth only the facts that I believe are necessary to establish
12 probable cause to believe that RICHARD CHARLES SANCHEZ has traveled in
13 interstate or foreign commerce with the intent to avoid prosecution in violation of Title
14 18, United States Code, Section 1073.

15 3. Based on the investigation by Tacoma Police, there is probable cause to
16 believe that RICHARD CHARLES SANCHEZ is a homicide suspect in shooting to death
17 Camille Love on February 7, 2010, and J. Lucas on March 25, 2010, and that he
18 knowingly fled the state of Washington to avoid being prosecuted in Pierce County
19 Superior Court for the murder of Ms. Love and Mr. Lucas all in violation of Title 18,
20 United States Code, Section 1073. Bench warrants were issued for RICHARD
21 CHARLES SANCHEZ in the Pierce County Superior Court on December 3, 2010, and
22 March 30, 2010, respectively, under cause numbers 10-1-05088-6 and 10-1-01402-2.

23 **SUMMARY OF PROBABLE CAUSE**

24 **The Love Murder**

25 4. On February 7, 2010, Tacoma Police responded to the 5900 block of
26 Portland Avenue regarding a shooting. When police arrived, they determined that
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1 Camille Love and her brother, J.L.,¹ had been shot. Camille Love died from her wounds.
2 J.L. survived.

3 5. Through witness interviews, detectives learned that the victims were
4 traveling in their red car on the way to the residence of a friend. While stopped at a
5 traffic light in the 7200 block of Golden Given, J.L. noticed that a white van stopped in
6 the curb lane next to them. J.L. saw a Hispanic male staring at them. As Camille Love
7 and J.L. proceeded through the light toward Portland Avenue, the white van followed
8 them. Camille Love turned northbound onto Portland Avenue and tried to speed away
9 from the van. The van caught up with the victim's car in the 6400 block of McKinley
10 Avenue. Multiple shots were fired from the van into the victim's car killing Camille
11 Love and wounding J.L. Police located the suspect van several blocks away after it had
12 been abandoned. Police determined that the van had been reported stolen a day earlier.

13 6. During the course of the investigation, detectives spoke with informants
14 who admitted to their participation in this murder and described the actions of others,
15 including SANCHEZ, Santiago Mederos, Jarrod Messer, Eduardo Sandoval. The
16 informants told detectives that they are members or associates of the Eastside Lokotes
17 Sureños (ELS) street gang along with SANCHEZ, Mederos, Messer, Sandoval, and
18 others. The informants told detectives that on February 5, 2010, two days prior to the
19 murder of Camille Love, several ELS gang members were shot at in the 3200 block of
20 Portland Avenue. One gang member was wounded. ELS leadership believed that rival
21 "Blood" gang members were responsible for the shooting. The informants described a
22 meeting at an ELS gang member's house during which retaliation was discussed.

23 7. On February 7, 2010, ELS gang members gathered at the North Tacoma
24 residence of their leader, Juan Zuniga. There, Zuniga assigned duties to several gang
25 members including SANCHEZ, Mederos, Messer, Sandoval, the informants, and others.

27 ¹ J.L., a victim who survived the Love murder, is not the same person as J. Lucas, the victim of the Lucas murder,
28 further described below.

1 The informants told detectives that the plan was to use a stolen van as a platform from
2 which the shooting would occur. Two gang members were assigned the task of stealing
3 the vehicle, which they accomplished. The informants told detectives that multiple cars
4 carrying ELS gang members were deployed to act as lookouts for police and spotters for
5 shooting targets. Sandoval and others were in these support vehicles and acted as
6 lookouts and spotters. Sandoval relayed information to other vehicles via cell phone.
7 After the shooting, the van was to be abandoned and burned. SANCHEZ was given the
8 duty of meeting Mederos and his co-passengers after the shooting at the location where
9 the stolen van was dumped and driving them away.

10 8. On September 22, 2010, Sandoval was arrested and confirmed the general
11 fact pattern recited above concerning the Camille Love homicide, to include his
12 participation as a lookout and scout. Sandoval told police that the group was ordered by
13 Zuniga to "look out for slob" (a derogatory term for rival blood gang members who are
14 associated with the color red), "look for cops," "if it gets hot, let us know," and finally to
15 "shoot on sight."

16 The Lucas Murder

17 9. On March 25, 2010, Tacoma Police responded to an alley behind a
18 residence in the 7000 block of Puget Sound Avenue regarding a shooting. When police
19 arrived, they discovered the victim, J. Lucas, being tended to by two friends. Lucas
20 appeared to have been shot once in the chest. Police started life support and were
21 relieved by Fire Department medics. Lucas was transported to a trauma center where he
22 was pronounced dead.

23 10. Police identified two witnesses who reported that they and Lucas returned
24 to the residence in the 7000 block of Puget Sound Avenue and saw a group of people in
25 the alley near a white Intrepid. The first witnesses stated that the group was getting into a
26 gray Nissan Maxima or Altima, which drove away and returned a few minutes later when
27 the occupants of the vehicle got out. Two male subjects approached the witness telling
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1 him to give them his wallet. The witness told the subjects "no," and the subjects began to
2 grab at his pockets. The witness stated that he was knocked to the ground and was
3 punched and kicked multiple times. Police noted that this witness was holding his right
4 ear and had blood covering his face and hands. The witness stated that he heard one
5 gunshot, but did not see who did the shooting.

6 11. Police transported the second witness from the scene and took his
7 statement, which was consistent with the information provided by the first witness and
8 that the subjects demanded money and asked, "Where is Reynaldo?" This witness stated
9 that as the attackers moved back toward the Nissan, a single shot was fired.

10 12. Police interviewed residents that lived nearby. The residents stated that
11 they yelled into the alley that the police had been called, and that the group moved to a
12 car when a single shot was fired. The suspect car then fled the scene.

13 13. On March 26, 2010, Tacoma Police detectives identified a vehicle as
14 possibly being related to the homicide investigation. Police were able to locate that
15 vehicle and detained the four occupants, including a juvenile, L.V.

16 14. L.V., after being advised of his rights, stated that the previous night, he was
17 with SANCHEZ, when they received a phone call from Byron Enrique Alvarez telling
18 them to go to the Motel 6 on Hosmer Street. While at the Motel 6, L.V. and SANCHEZ
19 met up with Alvarez, Santiago Mederos, and Andres Mendez. L.V. stated that Alvarez
20 was driving a newer silver four-door vehicle belonging to Alvarez. L.V. stated that
21 everyone (including SANCHEZ) got into the vehicle and drove to an alley behind a
22 residence in the 7000 block of Puget Sound Avenue to get back money from somebody
23 called "Reynaldo." L.V. stated that when they drove into the alley, they broke into and
24 ransacked a vehicle that belonged to "Reynaldo." After they broke into the vehicle, three
25 males arrived. The three males confronted L.V.'s group, and they began fighting. L.V.
26 stated that when his group started to lose the fight, they retreated to their vehicle. Before
27 SANCHEZ and one other member of the group got back into the vehicle, L.V. heard a
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1 single gunshot followed by SANCHEZ and the other group member getting into the
2 vehicle and saying "go, go, go."

3 Flight to Mexico

4 15. In February 2011, Tacoma Police Department detectives took a taped statement
5 from A.R. During that interview, A.R. stated that he or she drove SANCHEZ and Andres
6 Mendez from Tacoma to a Greyhound bus station in Medford, Oregon.

7 16. In April 2010, Tacoma Police Department Detectives spoke with Alenna Johnson,
8 sister of Andres Mendez, who at the time was living in St. George, Utah. Johnson stated that she
9 had picked up Mendez and a friend, "Richard," whom she later identified as RICHARD
10 SANCHEZ, at a Greyhound bus station in St. George, Utah. After a brief stay at their home,
11 Johnson's husband, Devin Johnson, drove SANCHEZ and Mendez to Las Vegas, Nevada.

12 17. Later in April 2010, Tacoma Police Department Detectives spoke with Rex
13 Conkright, who was reported to be the uncle of Andres Mendez and was living in Cuernavaca,
14 Mexico at that time. Conkright told detectives that he had received a phone call from Mendez
15 who stated that he was in Mexico City.

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Based on the Complaint and Affidavit sworn to before me, and subscribed in my presence, the Court hereby finds that there is probable cause to believe the Defendant committed the offense set forth in the Complaint.

David W. Christel

 DAVID W. CHRISTEL
 United States Magistrate Judge